ADEQ

A R K A N S A S
Department of Environmental Quality

August 14, 2017

Mr. Michael Hohnadel VP-MFG
Georgia Pacific Crossett LLC
Crossett Paper Operations
100 Mill Road
Crossett, AR 71635

RE: Discharge Permit Number AR0001210; AFIN 02-00013

Dear Mr. Hohnadel:

As you may be aware, EPA sent an Interim Objection Letter to ADEQ dated May 19, 2017 seeking more information on the referenced Draft Permit. Accordingly, ADEQ is requesting supplemental information for the permit application submitted May 22, 2015.

ADEQ requests additional detail regarding the following three (3) items:

1. A description of the current wastewater treatment system,
2. Documentation clearly demonstrating that Coffee Creek above Mossy Lake is separate from the Georgia Pacific Crossett (GP) wastewater treatment process, and
3. A qualified estimation that the discharge from Outfall 001 is protective of the Ouachita River during periods when Mossy Lake is flooded, i.e., above 65 ft as measured on the lower gauge at the Felsenthal Lock and Dam.

For item 1, a description of the current GP wastewater treatment system should include a process schematic, process narrative, process specific flow and loadings calculations, and a hydraulic profile.

For item 2, the documentation should include recent aerial photographs clearly depicting the relationship between Coffee Creek and the wastewater conveyance system mentioned in Item 1, a hydraulic profile, and latitude and longitude way points demonstrating center line locations at equal stream/conveyance distances.

For item 3, GP should provide a reasonable "desk top" estimation of the impact of Outfall 001 effluent on dissolved oxygen (DO) in the Ouachita River at several flood elevations. Because one would assume that the greatest impact would occur at the lower flood stages (i.e., 65 ft and above), a high and low flood event should adequately frame any impacts. AquAeTer, Inc. completed an extensive DO study and calibrated model dated April 1999 for low flow periods (June through September). This study included literature values for model input coefficients (i.e., Kd, Ka, SOD etc). Because the reply is time sensitive, GP may use similar seasonally adjusted literature values.

The AquAeTer, Inc. model correctly used the low flow and mixing zone descriptions in ACPC&EC Regulation 2. Because the low flow used in the model would not be appropriate, the Corps of Engineers stage discharge curve for Felsenthal Lock and Dam could be used to quantify the flow and mixing zone volume.

In order to provide a timely response to EPA, the Department would like to receive this information within the next three weeks. If additional time is needed please request in writing with adequate justification.

If you have any questions regarding this request please do not hesitate to contact me at (501) 682-0929.

Sincerely,

Robert E. Blanz, PhD, P.E.
Acting Sr. Operations Manager
Office of Water Quality

cc: Caleb Osborne, Associate Director, Office of Water Quality
Stacey B. Dwyer, P.E., Associate Director, NPDES Permits and TMDL Branch, EPA, Region 6